

Berger, Fischhoff, Shumer, Wexler & Goodman, LLP
Proposed Attorneys for the Debtor &
Debtor-in-Possession
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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re:

Chapter 11

RUDOLPH W. GIULIANI
a/k/a RUDOLPH WILLIAM GIULIANI

Case No.: 23-12055

Debtor.

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DECLARATION OF ANDREW GIULIANI

I, Andrew Giuliani, hereby declare pursuant to 28 U.S.C. §1746 that the following statements are true and correct to the best of my knowledge and belief after due inquiry as detailed herein:

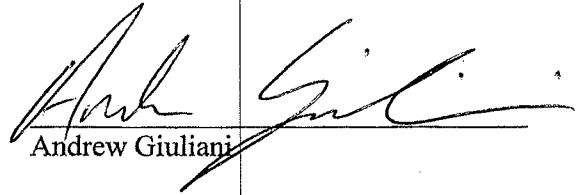
1. I am the President of Giuliani Defense. Giuliani Defense has paid \$30,000.00 to Berger, Fischhoff, Shumer, Wexler & Goodman, LLP towards the Chapter 11 retainer for Rudolph W. Giuliani. Giuliani Defense waives any and all reimbursement and/or indemnification of the \$30,000.00 advanced to the Debtor for its retainer of its Chapter 11 case.
2. I understand that the law firm of Berger, Fischhoff, Shumer, Wexler & Goodman, LLP (the "Firm") has been retained to represent the Debtor. I also understand that the Firm's obligation is solely for the representation of the Debtor to the exclusion of any other entity or individual.

2. Giuliani Defense will not seek to be reimbursed in the Chapter 11 nor will I file a claim in the Chapter 11 for such advances of monies.

3. Giuliani Defense is not a creditor of the Debtor.

4. Giuliani Defense does not intend to bid on any assets of the Debtor and does not intend to provide any financing to the Debtor beyond the payment of legal fees to Berger, Fischhoff, Shumer, Wexler & Goodman, LLP or on any other retained professionals whose retention on similar terms has been or will be approved, and from time to time may pay costs, such as, but not limited to, travel and lodging, to support Debtor's activities. Giuliani Defense also will not seek reimbursement for any of these payments.

5. Pursuant to 28 U.S.C. §1746 I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.


Andrew Giuliani